

## Goodfellow, Bob

---

**From:** Petersen, Chris  
**Sent:** Thursday, April 18, 2013 8:56 AM  
**To:** Ruhl, Christopher; Goodfellow, Bob  
**Subject:** Fw: From Mort Wakeland (EPCRA 313 Enforcement and TRI Program Coordinator - EPA Region 6) - Adair Grain, Inc, dba Wet Fertilizer Co, 1471 Jerry Mashek Drive, West, TX 76691-1862

---

**From:** [betterplanet@sbcbglobal.net](mailto:betterplanet@sbcbglobal.net)  
**Sent:** Thursday, April 18, 2013 8:48:33 AM  
**To:** Smith, Monica  
**Cc:** Webster, Susan; Hayes, Mark; Foster, Althea; Delgado, Eric; [groyles.ragan@epa.gov](mailto:groyles.ragan@epa.gov); Petersen, Chris; Snowbarger, Robert  
**Subject:** From Mort Wakeland (EPCRA 313 Enforcement and TRI Program Coordinator - EPA Region 6) - Adair Grain, Inc, dba Wet Fertilizer Co, 1471 Jerry Mashek Drive, West, TX 76691-1862

### BECAUSE EMAIL IS DOWN AT WORK, MONICA ASK THAT I SEND THIS TO EVERYONE VIA MY HOME EMAIL

West / Adair has not, and does not report to the Toxic Release Inventory (TRI) pursuant to Section 313 of EPCRA

EPA Registry ID: 110038267452

According to the 2010 Texas Manufacturer's Directory, the facility only has 9 employees.

One of the 3 required criteria for a facility to have to report to TRI is that a facility must have 10 full-time employees OR the equivalent of 20,000 hrs work among all full-time, part-time, and contract employees.

When things calm down at the site, we in EPCRA 313/TRI plan on "visiting" the facility to determine if perhaps they exceed the 20,000 hrs worked or the 10 full-time employees and failed to report to TRI. Of course, there is the possibility that the facility "manufactured, processed, or otherwise used" (covered activities under Section 313 of EPCRA) less than the required threshold for reporting anhydrous ammonia (25,000 lbs/yr for "manufacturing and processing" and 10,000 lbs/yr for "otherwise using").

Anhydrous ammonia is a listed TRI chemical.

If question arise regarding TRI, please feel free to contact me either by phone or by email.

Best week's wishes,  
Mort